

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE:
ROBERT J. WALDRON, JR.,
Debtor

CASE NO. 17-16763-ELF
CHAPTER 13

CITIZENS BANK, N.A.,
Movant

Hearing Date: 3/31/2020
Hearing Time: 9:30 a.m.

REQUEST FOR PRODUCTION OF DOCUMENTS

Pursuant to F.R.C.P. 34, Movant hereby requests that the Debtors produce for inspection by the undersigned attorney for the Movant the following:

1. If you deny any or all of the subsections under Movant's Request for admission No. 1:
 - (a) Canceled check, receipt, proof of money order, or other documentation evidencing that the post-petition payment due on 1/16/2018 through 2/16/2020, was tendered to Movant.
2. Copies of any and all documents, federal and state court opinions (whether published or unpublished), federal guidelines or other applicable statutory or common law bases upon which you rely in denying Plaintiff's Request for Admission Number 1.

Respectfully Submitted,

WELTMAN, WEINBERG & REIS CO., L.P.A.

/s/ Nathalie Paul
Nathalie Paul, PA Bar No. 309118
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